

Before the
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

FEB 22 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Application by Verizon New England)
Inc., Bell Atlantic Communications)
Inc. (d/b/a Verizon Long Distance), NYNEX)
Long Distance Company)
(d/b/a Verizon Enterprise Solutions) and Verizon)
Global Networks Inc. for Authorization To)
Provide In-Region, InterLATA Services)
in Massachusetts)

CC Docket No. 01-9 /

**SUPPLEMENT TO COMMENTS OF
THE TELECOMMUNICATIONS ADVOCACY PROJECT
IN SUPPORT OF VERIZON'S REQUEST FOR AUTHORITY
TO PROVIDE LONG DISTANCE SERVICE IN MASSACHUSETTS**

I. Introduction

The Telecommunications Advocacy Project (TAP) hereby supplements its Comments filed in the above captioned matter. On February 6, 2001, TAP filed comments with the Federal Communications Commission (FCC) on various issues concerning Verizon's 271 application. TAP supports FCC approval of the Verizon's application to provide long distance service in Massachusetts, pursuant to Section 271 of the Telecommunications Act of 1996. 47 U.S.C. §271, and hereby supplements the record with a letter from three members of Congress that do also.

II. TAP believes that Verizon will Enhance Competition in the Massachusetts Long Distance Market.

TAP has supported regulatory policies that allow Bell Operating Companies (BOCs) to enter the market and compete with incumbent long distance carriers on a level playing field. Without the entry of major new competitors for long distance service, incumbent carriers have less incentive to provide more innovative calling plans and compete for low volume users. There exists no viable competition other than Verizon in Massachusetts to exert pressure on incumbent carriers for more

consumer choices and lower prices. Verizon can compete for low volume users by offering low-cost calling plans with no monthly or minimum usage fees, and provide low-cost bundled services and innovative plans to meet the particular needs of consumers and businesses. Verizon can provide a broad range of telecommunications services to disadvantaged areas at reasonable cost because its infrastructure is already in place in inner cities and rural areas in the state.

III. Verizon Has a Positive History of Providing Long Distance Service in New York.

Verizon's recent history in New York is the best and most compelling evidence of the benefits from long distance competition that would be available to all consumers in Massachusetts. In December 1999, Verizon (then Bell Atlantic) made history by becoming the first BOC to receive approval by the FCC to provide long distance service,¹ and therefore was able to provide one-stop shopping for domestic and international telecommunications services to all of its New York based customers. Verizon challenged its major competitors by introducing several affordable and innovative calling plans, including bundled service options and a low-cost plan for low volume users. It has no monthly or minimum usage fees and consumers are automatically enrolled if they fail to select a more customized plan. Verizon also introduced several customized plans with competitive rates as low as 5 cents per minute during off-peak hours. For consumers looking for bundled service options, Verizon now offers a combination of services that meet the particular needs of consumers and lowers the total cost for these services.

Enclosed is a copy of a letter from three members of the New York Congressional Delegation in support of Verizon's efforts to expand its long distance authority. The letter signed by

1. *In the Matter of Application by Bell Atlantic New York for Authorization under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York, Memorandum Opinion and Order*, 15 FCCRcd 3953 at ¶426 (1999)(*Bell Atlantic New York Order*). *Id.* The Commission did not require Bell Atlantic to make a substantial additional showing that its participation in the long distance market will produce public interest benefits.

Congressmen Ed Towns, Eliot Engel and Gregory Meeks says “New York State has been cited as a model for other jurisdictions to follow in seeking similar authority to provide long distance service. The example in New York sets the stage for similar transitions throughout the service region for Verizon, and should be a standard that is emulated by other common carriers.”

TAP relies upon Verizon’s record in New York as support for Verizon’s 271 application in Massachusetts and urges the FCC to use measures that promote competition in the local and long distance telecommunications market in that state. Long distance competition will benefit consumers in Massachusetts, as it has in New York, by ensuring access to affordable, high quality services and new telecommunications technologies.

The recent Congressional letter supports that claim. In response to this major new competition in New York, AT&T, MCI/WorldCom and Sprint were forced to expand their services and offer more affordable and innovative plans. After Verizon entered the long distance market, these companies aggressively expanded into the local telephone market and introduced special, low-cost bundled services to give their customers more options. The three New York Congressmen, with their collective wisdom, agree that the new competitive environment brought about by Verizon’s entry into long distance totally reshaped the New York telecommunications market and greatly benefitted consumers. According to the Congressional letter and a study of telephone competition in New York by the Telecommunications Research and Action Center,² the new competition has resulted in saving on residential customers long distance and local phone bills.

2. Telecommunications Research and Action Center, A Study of Telephone Competition in New York, Sept. 6, 2000.

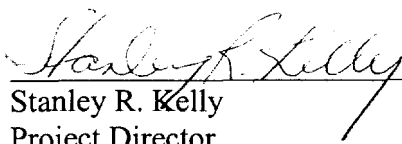
Consumers switching to Verizon for long distance service, and consumers switching local service to AT&T, MCI/WorldCom, Sprint and other local service companies are saving time and money. The Members of Congress found that the long distance market in New York has received robust competition and significant consumer savings in both long distance and local phone services due to Verizon. As in New York, consumers in Massachusetts will also receive considerable benefits from lower costs, more innovative plans and bundled service options resulting from Verizon's entry into the long distance market.

IV. Conclusion

The FCC should move forward in implementing competition in the telecommunications market in Massachusetts by approving Verizon's application to provide long distance service. The recent letter from members of the New York Congressional Delegation strengthens TAP's belief that Verizon's application will, if approved, bring great benefit to consumers in Massachusetts. New York and Massachusetts consumers will immediately benefit from competition generated by Verizon's entry into the long distance market. The FCC should resolve any legitimate issues expeditiously and approve Verizon's application without delay.

Respectfully submitted,

TELECOMMUNICATIONS ADVOCACY PROJECT

By: 
Stanley R. Kelly
Project Director
1211 11th Street, N.W.
Washington, D.C. 20001
(202) 898-0899
e-mail address: telcomproject@aol.com

Enclosure
Dated: February 22, 2001

Congress of the United States

Washington, DC 20515

February 16, 2001

Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Powell:

The merger of two phone companies, Bell Atlantic and GTE to create the new telephone company, Verizon reflects the new dynamic of the telephone business. As members of the New York delegation, we want to acknowledge the positive effects that have occurred as a result of Verizon receiving authority to provide long distance service throughout the state of New York, pursuant to Section 271 of the Telecommunications Act of 1996.

For many years, consumers were denied choices in telephone service. When the Act was passed, a procedure was established that called for Regional Bell Operating Companies (RBOCs) to fulfill a lengthy checklist before the state utility commission and the Federal Communications Commission would grant authority to provide long distance service. Verizon satisfactorily fulfilled all of the criteria to receive state, and subsequently federal authority to provide long distance service in New York. New businesses have been created and long distance rates are more competitive as a result.

New York State has been cited as a model for other jurisdictions to follow in seeking similar authority to provide long distance service. The example in New York sets the stage for similar transitions throughout the service region for Verizon, and should be a standard that is emulated by other common carriers. Residents of the State of New York have begun to enjoy the benefits of local service competition, and we commend the regulators and principals who were instrumental in helping to manifest this reality.

Sincerely,



Edolphus "Ed" Towns
Member of Congress



Eliot Engel
Member of Congress



Greg Meeks
Member of Congress

CERTIFICATE OF SERVICE

I, Stanley R. Kelly, do hereby certify that a copy this Supplement to Comments has been served on the following individuals via first-class, postage prepaid mail on February 22, 2001:

Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, S.W., Room 802
Washington, DC 20554

Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 802
Washington, DC 20554

Susan Ness
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 802
Washington, DC 20554

Gloria Tristani
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 802
Washington, DC 20554

Susan Pie
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W., Room 5-C224
Washington, DC 20554

ITS
445 12th Street, S.W., Room CY-314
Washington, DC 20554

Edward D. Young
Verizon Communications
1300 I Street , NW
Suite 400W
Washington, D.C. 20005

William Barr
Verizon Communications
1095 Avenue of the Americas
39th Floor
New York, N.Y. 10036

Milton Little, Jr.
Executive Vice President & COO
National Urban League
120 Wall Street
New York, NY 10005

Hilary Shelton, Director
NAACP Washington Bureau
1025 Vermont Avenue NW, Suite 1120
Washington, DC 20005

Harry Alford, President & CEO
National Black Chamber of Commerce
1350 Connecticut Avenue NW, Suite 825
Washington, DC 20036

George Herrera, President & CEO
US Hispanic Chamber of Commerce
2175 K Street NW, Suite 100
Washington, DC 20037

Brent Wilkes, Executive Director
League of United Latin American Citizens
2000 L Street NW, Suite 610
Washington, DC 20036

Todd McCracken, President
National Small Business United
1156 15th Street NW, Suite 1100
Washington, DC 20005

Susan Grant
Vice President for Public Policy
National Consumers League
1701 K Street NW, Suite 1200
Washington, DC 20006

Cleo Manuel, Executive Director
Keep America Connected
P.O. Box 27911
Washington, DC 20005

Samuel Simon, Chairman
Telecommunications Research & Action Center
P.O. Box 27279
Washington, DC 20005

Pace Duckenfield, Counsel
Alliance for Public Technology
919 18th Street NW. Suite 900
Washington, DC

February 22, 2001
Date

Stanley R. Kelly
Stanley R. Kelly